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10 Attorneys for Defendant
INTUIT INC.

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 IN RE: HIGH-TECH EMPLOYEE
16 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

17 THIS DOCUMENT RELATES TO:
18 ALL ACTIONS
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**DECLARATION OF CATHERINE T.
ZENG REGARDING DEFENDANT
INTUIT INC.'S PRODUCTION OF
DATA AND DOCUMENTS**

DECLARATION

I, Catherine T. Zeng, declare as follows:

1. I am an attorney at law, duly admitted to practice in the State of California and before this Court. I am an associate at the law firm of Jones Day, counsel for Defendant Intuit Inc. ("Intuit") in the above captioned action. I submit this Declaration regarding Intuit's production of data and documents to date pursuant to the Court's June 5, 2012 Case Management Order. As one of the attorneys involved in the defense of this action, unless as otherwise stated, I have personal knowledge of the facts stated in this Declaration and if called as a witness I could and would testify competently to them.

Data

2. Intuit has produced compensation and recruiting data from seven different databases. Intuit began this production on April 17, 2012 and made subsequent productions on May 9, May 10, May 13, May 17, May 21 and June 1. As part of its production of employee compensation data, Intuit produced bonus target amounts for each employee. After the production of this data, Plaintiffs inquired as to the availability of the actual bonus amounts that were paid to employees. Intuit investigated the availability of this data and was able to produce additional data for actual bonus amounts paid for February 1, 2010 to February 1, 2012 on June 14, 2012. Intuit is still investigating whether similar additional bonus data is available for the period before February 1, 2010. Compensation data for this period is in archives and must be restored. This process will take approximately two weeks. In the meantime, Intuit is also investigating other means of obtaining this data.

Documents

3. In total, Intuit has produced approximately 8,400 documents during this litigation. On November 30, 2011, Intuit produced approximately 900 documents that had previously been produced to the United States Department of Justice in connection with *United States v. Adobe Systems, Inc.* Intuit began rolling production of additional documents on April 17, and made subsequent productions on May 9, May 24, May 25, May 30 and June 15. Intuit has produced approximately 7,500 documents since April 17 and substantially completed its production of

1 documents on June 15, 2012.

2 4. Intuit still has some additional documents that need to be produced. These include
3 potentially privileged documents. In accordance with the parties' agreement, Intuit will produce,
4 on a rolling basis, any potentially privileged documents ultimately determined not to be
5 privileged, either entirely or in part, and will provide Plaintiffs with a privilege log on July 16.
6 Further, Intuit had some technical issues with some documents obtained from two custodians.
7 These issues have been resolved, but Intuit is still reviewing some documents from these two
8 custodians. I spoke with Plaintiffs' attorney Dean Harvey regarding these technical issues on
9 June 14 and informed him that some documents from these two custodians would be produced
10 after June 15. Intuit will complete its review of these documents and produce them as soon as
11 possible.

12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct. Executed this 18th day of June 2012 in Palo Alto, California.

14 Dated: June 18, 2012

Respectfully submitted,

Jones Day

17
18 By: 

Catherine T. Zeng

Attorneys for Defendant Intuit Inc.

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